



OLD NORTH BRIDGE

## TOWN OF CONCORD

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September 23, 2013

Melissa Taylor, Remedial Project Manager  
U. S. Environmental Protection Agency – New England  
Office of Site Remediation and Restoration  
5 Post Office Square  
Boston, MA 02109

Dear Melissa,

On behalf of the Town of Concord, we thank you for coordinating with the 2229 Main Street Oversight Committee and Concord Town officials in the remedial investigation and feasibility study at the NMI/Starmet superfund site.

2229 Main Street is one of the few large unrestricted and developable parcels remaining in Concord, and the town is anxious to maximize its use. There are many potential uses. Concord has an ongoing commitment to provide more affordable housing, including housing for elderly Concord residents who wish to “downsize” or require residential care facilities. We are also currently developing solar arrays on our former landfill and at other sites in town. The Town also has urgent need of new maintenance and storage facilities for school buses and town vehicles – especially heavy equipment. We would like to be able to consider the 2229 Main Street site for any and all of these purposes, as well as other residential, commercial and municipal uses.

Accordingly, we urge the EPA Remedy Review Board to encourage the EPA to select a cleanup alternative that will:

1. be the most protective of human health, taking into account both the well-being of workers and residents who live nearby during the remediation and the long-term health of future residents and occupants of the site;
2. allow for the most flexible future uses of the site by maximizing the buildable and livable areas of the property; and
3. leave no legacy infrastructure on the surface of the site once the remediation is complete.

For these reasons, in non-scientific terms, we ask that:

1. contaminated soils down to 15 feet below the surface, sediments near the surface where contamination is present, and contaminated materials down to the water table in the holding basin, be dug up and removed from the site;
2. the maximum amount of remaining source material in the bottom of the holding basin be stabilized with proven techniques (e.g., concrete);

3. uranium that has already migrated out of the holding basin area be treated deep below the surface, with methods that keep the uranium from dissolving in the water but still allow for unrestricted use of the land above;
4. organics in the water be removed with a traditional "pump and treat" system;
5. funds be set aside to remedy future vapor intrusion problems in buildings on the site; and
6. all of the solutions to be monitored over time to ensure that they are working properly.

As we understand that technology does not currently exist which will make the water clean enough to drink at the site, there will always be a need for limitations on activities and use that will prevent future residents and certain neighbors from digging drinking water or irrigation wells. However, we still request that the site be remediated to allow for the most unrestricted use of the land, including residential uses, and to prevent the migration of contaminated water off the site.

We are contemplating an action item for our 2014 Concord Town Meeting agenda that would allocate funds to examine the process and the liabilities of taking ownership of 2229 Main Street so that Concord voters will have the necessary information to decide at our 2015 Town Meeting if Concord should take control of the property. Whether we actually take ownership of the site or simply leverage the use of it in the future, we expect that this property will be developed quickly after a remedy is implemented.

Our desire for the unrestricted future use of 2229 Main Street is the driving force behind our suggested requests for dealing with uranium in the soil and overburden water. Our use of the site will be restricted if we must be concerned that accidentally rolling heavy machinery over the wrong spot or digging a building footing in the wrong place may undo remediation measures costing millions of dollars and require that the site be remediated again.

Turning this site into a landfill for mixed radioactive/hazardous waste by burying contaminated soils at the site will prevent us from developing this site because most of the site would be used for landfill which would be vulnerable to accidental damage. Although we recognize the advantages of dealing with the waste entirely on the site and not disposing of it elsewhere, Concord in general, and this location in particular, are not appropriate locations for hazardous waste disposal. Concord is an historic town with many sites of international significance, and 2229 Main Street is in the middle of a residential community, abutting a children's summer camp, and across the street from a river and neighborhood ice rink.

The draft executive summary also describes a strategy that uses in-situ chemical stabilization to immobilize remaining contaminants in the holding basin. While this may be an innovative approach, chemical stabilization creates uncertainty about the long-term stability of the remedy, which has not been demonstrated. NMI tried to chemically stabilize the materials they dumped decades ago, and the failure of their methods is the reason that we have depleted uranium in the water today.

In our view, any contaminated material that can be dug up and removed, should be. Soil remedies that use cement-based solidification instead of chemical modification to contain contaminated source materials are a proven methodology and are the least vulnerable to damage by machinery or changing environmental conditions at the surface. Such remedies may be more expensive, but these "brute force" solutions will allow for unrestricted use of the area above the holding basin and are guaranteed to stop the migration of uranium into the water from source material that has seeped down to the bedrock. We believe that contaminated

materials can be successfully removed from the site down to the level of the water table and see no reason not to dig out the most contaminated material and ship it off-site.

Although we have expressed concerns about chemical stabilization methods for treating the holding basin, using this innovative technology to isolate uranium in water that has already migrated out of the holding basin is better than pumping and treating this water for many years. The footprint of the pump-and-treat system for taking DU out of groundwater would be large and energy-intensive, and activities at the site would be severely restricted because of the building space and power and piping required. For these reasons, we recommend that the chemical stabilization method be tried first. In the worst case, if chemical stabilization does not stop the migration of uranium from outside of the holding basin area, a pump-and-treat system can always be added in the future.

To quote our 2229 Main Street Committee, "the vapor intrusion issue has been deferred repeatedly during the RI/FS process. We are concerned that risk and remediation options for organic solvents that contaminate the soils and groundwater at the site, under the building slabs, and across the street are not being carefully evaluated." This site should be restored to a buildable condition, and since the vapor intrusion risk is unknown, funds should be set aside so that future buildings can have remedies like sub-slab ventilation systems built into them, if necessary.

Thank you again for giving us this early opportunity to review the remediation options at the site and for listening to our concerns. We trust that you will select a remediation plan that will allow us to restore this site as a productive part of our community.

Sincerely,



Jeff Wieand, Chair  
Board of Selectmen  
Town of Concord

cc: Chris Whelan  
Pam Rockwell